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7 *Attorneys for GOOGLE LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
SECOND AMENDED COMPLAINT**

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CASE NO. 3:20-CV-06754-WHA

DECLARATION OF LINDSAY COOPER IN SUPPORT OF GOOGLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL PORTIONS OF ITS SECOND AMENDED COMPLAINT

I, Lindsay Cooper, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Second Amended Complaint (“SAC”) (“Google’s Administrative Motion”). If called as a witness, I could and would testify competently to the information contained herein.

2. Google’s Administrative Motion seeks an order sealing the portions of the documents listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s SAC	Portions highlighted in yellow	Google
SAC Exhibit 2	Entire Document	Google
SAC Exhibit 3	Entire Document	Google
SAC Exhibit 4	Entire Document	Google
SAC Exhibit 5	Entire Document	Google
SAC Exhibit 6	Entire Document	Google

3. The portions of Google’s SAC highlighted in yellow as well as Exhibits 2 and 3 contain confidential business information and terms to confidential agreements that are not public. Public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to Google’s highly confidential business thinking and asymmetrical information about Google’s collaboration strategies to other entities. If such information were made public, I understand that Google’s competitive standing would be significantly harmed. A less restrictive alternative than sealing the highlighted portions would not be sufficient because the information sought to be sealed is Google’s proprietary and confidential business information but is necessary to the claims in Google’s SAC.

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lindsay Cooper has concurred in the aforementioned filing.

DATED: February 4, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven